Summary of Pilot Project Activities

Pilot project Chairs were selected starting in October 2002, pilot project Charters were developed in December 2002 through February 2003, and subsequently a working group was established for each pilot project following Management Directive 5.3. (The Pilot Project 4 working group was established in January 2004. OAS chose not to establish a working group for the Pilot Project 4 until they had identified a new use of material or modality.) NRC and Agreement State staff jointly developed a "NMP Pilot Projects Implementation Plan," including detailed schedules and milestones. The Plan provided a step-by-step guide for implementing the pilot projects, leading to the submission of each individual pilot project final report and the final NMP paper. Once established, each working group developed a pilot project specific work product plan to meet milestones identified in the Implementation Plan.

The lead organization for the Pilot Projects are: Pilot Project 1-STP, Pilot Project 2-CRCPD, Pilot Projects 3 and 5-NMSS, and Pilot Project 4-OAS. The Charter and work product plan for each pilot project were reviewed and approved by the STP and NMSS Directors, and OAS and CRCPD Chairs.

STP provided day-to-day project management support for the pilot projects and carried out the "administrative core" staff functions envisioned under the Alliance option. This included initial drafting of the Implementation Plan; assistance in report drafting; administrative support, when requested by the pilot project Chairs; maintenance of the NMP website; and coordination of activities such as the Federal Register Notices, presentations to the annual CRCPD, OAS and Health Physics Society (HPS) meetings, and stakeholders' meeting.

The STP project manager held monthly conference calls with the pilot project Chairs beginning in March 2003. During the conference calls, pilot project Chairs provided status reports and updates on the progress of the pilot projects. The STP project manager also distributed the conference call meeting notes including pilot project status reports and updates to principal NRC, OAS and CRCPD management and staff (i.e., STP and NMSS Directors, OAS and CRCPD Chairs, pilot project Chairs and working group members).

Changes to the Implementation Plan milestones and schedule were discussed in the monthly pilot project Chairs conference calls and distributed to the STP and NMSS Directors, and OAS and CRCPD Chairs on a regular basis. Pilot project Chairs worked closely with their lead organizations. Joint meetings with the management of other participating organizations were held when needed, to discuss issues and to reach consensus on how individual pilot project issues should be addressed and resolved.

In addition, NRC managers and staff members were invited to provide feedback and input on specific areas including Deputy Director of the Office of the Nuclear Security and Incident Response, the Assistant General Council for Rulemaking and Fuel Cycle of the Office of the General Counsel, the Division Director of the Region I Division of Nuclear Materials Safety, the Branch Chief for Radiation Protection, Environmental Risk and Waste Management Branch of the Office of Nuclear Regulatory Research, and two staff members from the Office of the Chief Financial Officer.

The following is a summary of each pilot project:

Pilot Project 1

Pilot Project 1: Establishment of a prioritization process for development of materials policy, rulemakings, and guidance documents. To meet its objectives, the Pilot Project 1 working group completed the following work products: (1) a process that NRC and the Agreement States could use to establish priorities for development of materials policy, rulemaking, and guidance documents; (2) a national priority list; and (3) a proposed framework. The working group tested the prioritization process and framework for implementation of an Alliance-based NMP which included recommendations on specific regulatory needs made to the working group's Steering Committee. The Steering Committee was composed of NRC management and the Chairs of OAS and CRCPD (or their designees).

The pilot project demonstrated that a coalition made up of NRC and Agreement States can produce products that can be used by both NRC and Agreement States. The project also demonstrated that NRC and Agreement States could collaborate in making decisions on implementing plans to address specific regulatory needs in the materials program. Although the scope of the pilot did not permit demonstration that the Alliance will be a sustainable program for the NMP in the future, the test of the process gave indications that such a sustainable program is possible.

While Pilot Project 1 demonstrated that NRC and Agreement States could work together under a joint process to prioritize materials program work and develop a proposed framework for establishing NMP priorities, additional work is needed to define how commitments of resources to be used for development of work products would be incorporated into NRC and State budget processes such as NRC's Planning, Budgeting, and Performance Management (PBPM) prioritization process.

Pilot Project 2

Pilot Project 2: CRCPD's G-34 Committee on Industrial Radiography serve as the lead organization to oversee a national industrial radiographer safety certification program. Currently, 10 States and the American Society for Nondestructive Testing, Inc. (ASNT) are recognized as certifying entities. Only ASNT has submitted a formal application requesting recognition as a certifying entity; and no formal, follow-up evaluations of any of the existing certification programs have been conducted, underscoring the need for a centralized certification forum. The final work products consist of two documents specifying radiographer certification program evaluation and review criteria. The working group's final report provides recommendations for future NRC activities, including rulemaking, needed to support a national certification system.

The pilot project demonstrated that NRC, States and ASNT could share resources toward the common goals of shaping policy, maintaining a safety perspective, and developing procedures and products that could provide consistency in the certification programs nationwide.

While Pilot Project 2 demonstrated that an existing CRCPD working group can effectively develop criteria for a national radiographer safety certification program, NRC and CRCPD need

to reach agreement on CRCPD implementation of a national radiographer safety certification program.

Pilot Project 3

Pilot Project 3: Operating experience evaluation. This pilot project has examined NRC and Agreement State processes for collecting, reviewing, analyzing, and disseminating lessons learned from operating experience. The working group's final report provides recommendations for improving the communication and consistency of operating experience evaluation between NRC and Agreement States, enhancing integrated decision making through decision-oriented activities, and updating procedures to reflect current needs and government-wide initiatives. The pilot project demonstrated that electronic media can be used effectively to achieve initiatives and partnering between Agreement States and NRC without undue burden of travel. The pilot indicated that a diversity of approaches can be applied to the NMP and recommended that working groups and surveys be pursued on a more selective basis.

While Pilot Project 3 developed a number of specific recommendations on how NRC and Agreement States can better collaborate in the evaluation and use of operational experience and event information, recommendations for enhancing communications, procedures, processes, and for development of a possible operating experience clearinghouse need to be considered by NRC and Agreement States.

Pilot Project 4

Pilot Project 4: States develop licensing and inspection guidance for a new use of material, or a new modality, not previously reviewed and approved. This pilot project working group identified iodine-125 seed localization of non-palpable lesions for guidance development. To meet its objectives, the working group completed the following work products: (1) licensing guidance for use of iodine-125 seed localization for non-palpable lesions, and (2) inspection guidance for iodine-125 seed localization procedures. The pilot project demonstrated that Agreement States can assume the responsibility for development of licensing and inspection guidance for use by both NRC and Agreement States.

While Pilot Project 4 demonstrated that OAS can take the lead to develop licensing and inspection guidance for a new use of material, it is not known at this time whether NRC and Agreement States will use the licensing and inspection guidance developed by Pilot Project 4.

Pilot Project 5

Pilot Project 5: Revision of Inspection Manual Chapter (IMC) 2800, Materials Inspection Program. This pilot project working group completed its tasks in revising the IMC 2800 and seven associated routine inspection procedures for non-medical types of use. The revised materials inspection program is currently being implemented by the NRC Regional offices. The working group queried the Agreement States about implementation of revised IMC 2800 and the inspection procedures. About 20 percent of the States responded. The States which responded indicated that their routine inspections are more frequent than the revised IMC 2800. The pilot project demonstrated that the overall labor rate for routine inspections was reduced in each of the NRC's Regional offices.

While Pilot Project 5 demonstrated that NRC and Agreement States can work cooperatively to draft and pilot test revisions to guidance documents, i.e., the risk-informed and performance based revised IMC 2800 procedures, it is not known at this time whether Agreement States will embrace and implement inspection procedures consistent with the revised IMC 2800 procedures.